

BANKRUPTCY LAW GROUP, P.C.

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Attorneys for Debtors

GARRISON MORANVILLE and

SHELLY MORANVILLE

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT COURT OF CALIFORNIA

In re:

GARRISON MORANVILLE and
SHELLY MORANVILLE

Debtors.

) Case No.: 10-35830

) Chapter 7

) DCN: BLG - 001

) **MOTION FOR ORDER COMPELLING
TRUSTEE TO ABANDON DEBTORS'
BUSINESS AS ASSET OF ESTATE [11
USCS §§ 554(b), 721]**

) Date: Aug 10, 2010

) Time: 9:30 a.m.

) Courtroom: 35, 6th Floor

) Honorable Judge Christopher M. Klein

**MOTION FOR ORDER COMPELLING TRUSTEE TO ABANDON DEBTORS'
BUSINESS AS AN ASSET OF THE ESTATE**

Debtors GARRISON & SHELLY MORANVILLE, by and through the attorney of record

Chad Johnson, will and hereby do bring a Motion to Compel Trustee to Abandon The Estate's

Interest in Debtors' Business ("Motion") pursuant to 11 U.S.C.S. §§554(b) and 721 of the

Bankruptcy Code and Federal Rule of Bankruptcy Procedure 6007(b).

By this motion Debtors request that the Court enter an order compelling the Chapter 7
Trustee to abandon the bankruptcy estate's interest in Debtors' business on the following grounds:

1. Debtors' business does not possess or own any assets that might be liquidated for value to benefit creditors and is therefore of inconsequential benefit to the estate, and;
2. The retention and operation of the business by the Trustee would be burdensome and costly to the estate and the creditors thereof.

Said grounds will be supported by this notice of motion, by the motion filed herewith, by the pleadings and papers on file in this bankruptcy case, memorandum of points and authorities herein, declaration in support of this motion and exhibits, if any, filed herewith, and by such oral and documentary evidence as the Court may permit upon the hearing of this motion.

BANKRUPTCY LAW GROUP, P.C.

Dated:

6-30-10

By:



Chad Johnson, Esq.
Attorney for Debtors